

Colorado Department of Health

Review and Comment

Draft Phase I RFI/RI Workplan
Original Process Waste Lines (OPWL), OU 9; June, 1990

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General Comments:

As discussed in staff level telephone conversations, the following points should be taken into consideration in the preparation of the final version of this document:

- 1) The document should be organized into what has become the standard format for Rocky Flats RFI/RI Workplans (ie. similar to the new OU 7 RFI/RI Workplan). This would involve the addition of at least the following:
 - a) an expanded ARAR section
 - b) DQO section similar to OU 7
 - c) Baseline Risk Assessment section
 - d) addition of SOPAs and QAAs, if necessary
 - e) Environmental Evaluation section
 - f) potential pathway analysis
- 2) As stipulated in the IAG, RCRA regulated OUs have a two phase investigative approach. Phase I would be to characterize the sources and the soils within the OU and Phase II would determine the nature, extent, fate, and transport of any contamination. Since this is a Phase I document, indication is needed that this document will only address the characterization of the contaminant sources and the soils.
- 3) As an overall impression, the discussions of the various items in the text should be expanded. While the Division appreciates brevity, this document should completely discuss the data, history, and plan presented.
- 4) An effort should be made to incorporate the latest data available, no matter the source. In addition, the latest interpretation of the data should be discussed. An example would be the latest interpretation of the bedrock and alluvial geology.
- 5) The maps and diagrams presented in the draft version need to be updated. Care should be taken to make the maps and figures accurate and complete, but also concise. Please

include diagrams, maps, and tables anywhere that they can help clarify the text.

Specific Comments:

Executive Summary: The third paragraph on page 1 indicates that the Baseline Risk Assessment (BRA) is performed to evaluate whether an Interim Remedial Action (IRA) is necessary. This is only partly correct. IRAs can be required at any point in the investigation of an Operable Unit and are not the exclusive result of the BRA. Furthermore, there are many purposes for the BRA - an analysis of a possible IRA being only one.

Section 2.1.2.1: The second paragraph on page 10 states that the lateral and vertical extent of releases from the OPWLs are expected to be largely confined to the pipeline trench backfill materials and adjacent soils. This may prove to be the case, but it is still open to question. The FSP needs to be designed so that this question is answered.

Section 3.1.1: Relating to the previous comment, the Pipeline Leak Model paragraph of this section states that infiltration of leaking process waste into the lower-permeability native soil surrounding the trench is assumed to be negligible. The Division is concerned that, at this point in the investigation, this is a bad assumption. Leaks could have been active for many years and leaked contamination could easily have moved beyond the trench fill material. Again, this is a question that needs to be answered by a well designed FSP.

The typical leak rate of two gallons per minute presented in this section seems rather high. It is very possible that many smaller leaks were present that went undetected for long periods of time, or were never detected. These leaks would never have had a leaked volume big enough to spread contamination 600' along the pipe trench. Therefore, the Division suggests making the soil sampling spacing smaller than the 300' spacing outlined presently. Also, we would suggest adding soil sampling locations at pipeline elbows and valve boxes where leaks were more likely.

Section 4.3.1: This section needs to completely describe how the tanks will be inspected.

The Division urges that this section be expanded. Tanks that were part of the old system that have either been removed or permanently sealed still need to be investigated. Tanks that have been removed need for the adjacent soils to be sampled. Tanks that have been permanently sealed need to be re-inspected to verify their condition and the adjacent soils need to be sampled. These samples are particularly needed for tanks that were underground or partially underground, but apply to all the old tanks that fall into these categories.

In addition, tanks that were incorporated into the new system also

need an evaluation. If their condition is well known based on recent inspections, this should be included in the RI Report. However, if their present condition is unknown, they need to be added to this investigation and sampling program.

Section 4.4.1: The second paragraph on page 38 describes the samples that will be collected along the pipelines. The Division suggests adding a sample from the bottom of the pipeline fill above the native soil.